



August 22, 2018

Ms. Carmen Santos  
PCB Coordinator  
U.S. Environmental Protection Agency, Region 9 (WST-5)  
75 Hawthorne Street  
San Francisco, CA 94105

**Subject: Response to Comments - Draft Cleanup Plan Approach  
Former Westinghouse Apparatus Repair Facility, Rancho Dominguez, California**

Dear Ms. Santos:

On behalf of CBS, WSP is providing responses to your comments dated July 12, 2018, on the Draft Cleanup Plan Approach for the former Westinghouse Repair facility in Rancho Dominguez, California. The U.S. Environmental Protection Agency's (EPA) comments are provided verbatim below, followed WSP's and CBS's responses. Note that EPA's comments were made using a "Sticky Note" feature of PDF documents. WSP added the numbering system and comment location descriptors for future referencing purposes.

## COMMENTS AND RESPONSES (TEXT)

### *Comment 1 (Remediation Decision Units)*

*General Comment: All areas investigated in the interior of the building need to be discussed in the PCB cleanup plan. For those building areas and features for which CBS/WSP is not recommending a cleanup of PCBs, the data for those areas and/or features must be properly summarized and explanations included as to why a PCB cleanup is not necessary.*

*While I believe that we have reached a good preliminary agreement on the PCB 95%UCL calculations (via ProUCL) for the concrete floors inside the building, the spatial distribution of PCB concentrations on the floor must be evaluated and considered together with the 95% UCL calculation results in determining the areas of the concrete floors that will be cleaned up. A PCB cleanup may be warranted in areas where the spatial distribution of the data suggests that such action is necessary but the 95% UCL appears to be acceptable.*

#### **Response**

The PCB Cleanup Plan will include a summary of the historical PCB investigations, the 2015 building cleaning activities, and the post-cleaning sampling results. The scope of the PCB Cleanup Plan will be based on the results of the analyses of all data collected from the site. Justifications will be provided for areas and media that will not be addressed in the scope of work.

The spatial distribution of the concrete bulk sample data will be considered during development of the scope of work for the concrete floors.

### *Comment 2 (Non-porous surfaces in Table on page 2)*

*The surface wipes results reflected in Figure 3 seem not to be reflected here. Certain Floor Drains must be part of the PCB cleanup due to the high PCB levels detected in surface wipe samples. Also, I am recommending that concrete floor samples be collected immediately adjacent to the Floor*

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*Drains that exceed the surface wipe PCB cleanup goal of 5 ug/100 cm sq. The Floor Drain by H-10 need to be addressed and a summary of conditions presented in the PCB cleanup plan (e.g., wipe samples, results of drain contents [e.g., debris, "sediments"]).*

#### **Response**

The floor drain wipe sample locations and results shown on Figure 3 include pre-cleaning, post-cleaning, and in some cases, re-cleaning sample results. For example, at the floor drain located at grid intersection N278-E160, the initial sample result was 240  $\mu\text{g}/100\text{ cm}^2$ . Based on this elevated result, WSP directed the contractor to re-clean the drain surfaces. Following the re-cleaning, WSP resampled the drain (sample identification affixed with "-R") and the result was 0.67  $\mu\text{g}/100\text{ cm}^2$ . This result was used in the ProUCL calculation for the Non-Porous Surfaces Floor Grates and Drains decision unit.

There were no post-cleaning floor drain samples that exceeded the PCB cleanup goal of 5  $\mu\text{g}/100\text{ cm}^2$ . Regarding the floor drain near H-10, a bulk sample of dust/debris from the drain contained 6.5 mg/kg PCBs, but no PCBs were detected in the post-cleaning wipe sample. The pre- and post-cleaning conditions of the floor drains will be address in the PCB Cleanup Plan.

#### **Comment 3 (Non-porous surfaces in Table on page 2)**

*Discussion of the crane hoists and tracks need to be included here. These features need be part of the PCB cleanup based on the wipe sample results in Figure 3. Please refer to my comments on Figure 3.*

#### **Response**

Lubricating oil and grease covered portions of the crane hoists and tracks. The contractor attempted to clean these features using the same procedures used for other non-porous surfaces at the facility. Certain samples of these oily/greasy surfaces showed elevated concentrations of PCBs. CBS issued a change order to the contractor to perform a more rigorous cleaning of ALL of the crane tracks and hoists (not just the areas where samples were collected). The additional cleaning included manual scraping, wiping, and aggressive scrubbing using the Simple Green® detergent. Following recleaning, WSP resampled (identifications affixed with "-R") the surfaces near the original sample locations to assess the efficacy of the more rigorous screening. The results showed a significant reduction of the PCB concentrations in surface wipe concentrations. The highest individual result for the Non-Porous Surfaces Greater than 8 Feet High decision unit was 5.7  $\mu\text{g}/100\text{ cm}^2$ . The calculated exposure point concentration (EPC) for the final post-cleaning data was 1.7  $\mu\text{g}/100\text{ cm}^2$ , which is well below the 10  $\mu\text{g}/100\text{ cm}^2$  RBCL for this decision unit.

#### **Comment 4 Text -- (Concrete Floors in Table on page 2)**

*Refer to the comments above under "Non-Porous Surface." The concrete floor area adjacent to the Floor Drains where the PCB results for wipe samples collected from the drains exceed the cleanup goal must be sampled. The area of the Floor Drain by H-10 should be included in the PCB cleanup plan.*

#### **Response**

CBS will agree to sample the concrete floors near floor drains where pre-cleaning sample results exceeded the RBCL. The post-cleaning wipe sample from the floor drain near column H-10 did not contain PCBs. No additional cleaning should be required at this location.

#### **Comment 5 (Transformer Pit in Table on page 2)**

*Sump inside the transformer pit. What is the story with this feature? Was the sump sampled inside? Was the grate covering the sump sampled? If the sampling described here was conducted, what are the results? If the sampling has not been conducted, it should be done to understand PCB conditions in the sump if PCBs are present. Also, this information is necessary for completeness of the transformer pit PCB characterization and for the land use covenant as the proposed cleanup strategy for the transformer pit is to backfill the pit and cap it at 4 feet below the floor elevation.*

#### **Response**

A small, grated sump is present in the northwest corner of the transformer pit. The sump was observed to have no pipe inlets or outlets. The grate could not be removed during cleaning activities and no samples were collected from the grate or the sump surfaces. The sump and grate will be further evaluated through observation and sampling as part of the PCB Cleanup Plan scope of work. It is important to note that the sump and grate are likely to contain high concentrations of the PCBs based on the nature of the historical use as a collection point for fluids that leaked from PCB transformers. The



sump location is very close to the wall sample that contained 4,500 mg/kg PCBs. Other than documenting the concentrations for the recording of the land use restrictions, the proposed capping remedy is not anticipated to change.

**Comment 6 (HVAC System in Table on page 2)**

*We need to better understand this system and if it is related or associated with the vents I have noticed in the photos of the office space. In addition, some of the ducts have detection for PCBs (wipe samples). While those detections may be below 5 ug/100 cm sq, we are talking about a ventilation system and this system should be looked at in a different way than others features inside the building. PCBs should not be present in any components of the ventilation system.*

**Response**

The duct samples in the warehouse are not related to ventilation system in the western office area. Rather, they are partially removed ductwork associated with exhaust vents from paint booths and other equipment. The only forced-air ventilation systems are in the office area on the west side of the facility. CBS and WSP agree that the ventilation system in the western office area needs to be studied and better understood before a remedy can be formulated. This analysis will be conducted as part of the PCB Cleanup Plan development.

**Comment 7 (Remediation Approach for Concrete Floors)**

*This analysis must be inclusive of an evaluation of the spatial distribution of the PCB analytical results for the floor. In addition, I am recommending that additional concrete samples be collected immediately adjacent to floor drains where the surface wipe concentration for the grates is above 5 ug/100 cm sq (e.g., 220 ug/100 cm sq, FD-WP-N278-E160). These additional concrete characterization samples may be collected in tandem with the PCB cleanup activities.*

**Response**

Spatial distribution of the PCB concrete floor data will be considered during development of the PCB Cleanup Plan. As described in the response to Comment 4, additional samples of the concrete floors will be collected where historical pre-cleaning sample results exceeded the RBCLs. Note that in EPA's example cited above, the initial sample at FD-WP-N278-E160 was actually 240 µg/100 cm<sup>2</sup>; the final post-cleaning wipe sample result at this location (FD-WP-N278-E160-R) was 0.67 µg/100 cm<sup>2</sup>.

**Comment 8 (Remediation Approach for Perimeter Walls)**

*I recommend the PCB cleanup plan at*

**Response**

This comment appears to be incomplete. Please let us know if EPA has a comment related to the perimeter walls remediation approach.

**Comment 9 (Remediation Approach for Transformer Pit)**

*The sump inside the transformer pit must be evaluated by sampling the grate that may cover it, and sampling the interior of the sump and any debris that may be present in the sump. Also, the sump should be assessed for the presence of any piping to determine if such piping exists beneath the floor and document its existence if that is the case. Sampling of transformer pit sump components may be conducted before or in tandem with the PCB cleanup.*

*The PCB cleanup plan must document the results of the soil sampling conducted beneath the transformer pit, any soil removal conducted, and residual PCB concentrations in soils beneath the transformer pit. The depth to ground water beneath the transformer pit should also be documented together with an explanation as to whether the PCB impacted soils planned to be left in place present a threat to ground water or not.*

**Response**

As described in the response to comment 5, additional analysis of the sump and grate will be conducted during implementation of the PCB Cleanup Plan. However, the results are not expected to change the remediation approach for the transformer pit. The sump is for collection only, there were no pipes observed entering or exiting the sump.

The PCB Cleanup Plan will include a summary of the soil data beneath the transformer pit. No soil removal has been conducted beneath the pit. Groundwater depth near the transformer pit is approximately 47 feet below the ground surface, which corresponds to approximately 35 feet below the bottom of the pit. One sample collected at a depth of 5 feet from the bottom of the transformer pit contained 51 mg/kg PCBs. A sample at a depth of 10 feet in this same boring did



not contain detectable concentrations of PCBs. The depth of this non-detect sample is approximately 25 feet above the water table. Based on this data, groundwater is unlikely to be affected by PCBs.

**Comment 10 (Remediation Approach for Northeast Loading Dock Walls)**

*The other loading docks present in the building should be included in the PCB cleanup plan with a summary of findings and explanation as to why they should not be subject to the PCB cleanup.*

**Response**

Each of the three loading docks has been identified as its own decision unit. The results and analysis will be summarized in the PCB Cleanup Plan. The maximum detected and EPCs for the two loading docks on the southern end of the facility did not exceed the RBCL; therefore, no remediation will be required.

## COMMENTS AND RESPONSES (FIGURE)

**Comment 11**

*I recommend further cleaning be conducted at FDWP-N278-E160[240]. Wipe sample result is too high, 240 ug/100 cm sq. Provisions in the PCB regulations that apply to PCBs at or above 500 mg/kg (e.g., PCB articles) also apply to surface concentrations equal to or above 100 ug/100 cm sq. Therefore, this drain must be further cleaned up. In addition, if concrete floor samples have not been collected in the immediate area of this drain, I recommend samples be collected to determine PCB concentrations in the concrete floor near this drain.*

**Response**

The floor drain at grid intersection N278-E160 was recleaned and resampled with a result of 0.67  $\mu\text{g}/100\text{ cm}^2$  as shown on the figure. As described above, the concrete in the vicinity of the floor drains will be sampled.

**Comment 12**

*I recommend further cleaning at WP-63 [5.69]*

**Response**

The EPC for the Non-Porous Surfaces Greater than 8 Feet High is 1.7  $\mu\text{g}/100\text{ cm}^2$ , which is well below the RBCL of 10  $\mu\text{g}/100\text{ cm}^2$ . No additional cleaning should be required at this location.

**Comment 13**

*WP-90[26]. I recommend PCB cleanup be conducted. Result is too high. Provisions in the PCB regulations applicable to PCBs at or above 50 mg/kg to less than 500 mg/kg also apply to surface concentrations above 10 ug/100 cm sq to less than 100 ug/100 cm sq.*

**Response**

The crane hoist containing 26  $\mu\text{g}/100\text{ cm}^2$  was recleaned and resampled (WP-90-R); the result was non-detect. No additional cleaning should be required at this location.

**Comment 14**

*The result for wipe sample WP-24 (Crane Track) is 27 ug/100 cm sq. This is too high to leave in place. I recommend further cleaning.*

**Response**

The crane track containing 27  $\mu\text{g}/100\text{ cm}^2$  was recleaned and resampled (WP-24-R); the result was non-detect. No additional cleaning should be required at this location.

**Comment 15**

*This result is higher than the 5 ug/100 cm sq goal for surface wipes. I recommend further cleaning of the crane track. This also applies to the sampling location WP-31 (Crane Track) [6.9]*



**Response**

The entire crane track was recleaned as described in the response to comment 3. After recleaning, a new sample, WP-32-R was collected approximately midway between WP-31 and WP-32. The result for sample WP-32-R was non-detect. No additional cleaning of the crane track is warranted.

**Comment 16**

*This result is high for surface wipes. What is the plan for this grate? Looks like it should be part of the PCB cleanup. In addition, concrete floor areas immediately adjacent to this grate should be sampled to determine PCB concentrations.*

**Response**

The final post-cleaning wipe sample results for the grate top and grate side were 2.2 and 2.4  $\mu\text{g}/100\text{ cm}^2$ , respectively. The EPC for the Non-Porous Surfaces Floor Grates and Drains decision unit is 1.8  $\mu\text{g}/100\text{ cm}^2$ , which is well below the RBCL of 5  $\mu\text{g}/100\text{ cm}^2$ . No additional cleaning of this grate is warranted.

**Comment 17**

*While not a high wipe result, is the result for a duct. Is this a ventilation duct? Does the building have ventilation? Are these ducts part of that ventilation system?*

**Response**

No, there are no ventilation ducts in the warehouse areas. The ducts along the ceiling of the warehouse were exhaust ducts that have been cut near the ceiling and removed.

**Comment 18**

*This wipe sample result is borderline, it is 5.7 ug/100 cm sq. What is the plan here. I recommend further cleaning.*

**Response**

The EPC for Non-Porous Surfaces Greater than 8 Feet High is 1.7  $\mu\text{g}/100\text{ cm}^2$ , which is well below the RBCL of 10  $\mu\text{g}/100\text{ cm}^2$ . No additional cleaning should be required at this location.

WSP and CBS will be prepared to discuss these comments and responses during the next bi-weekly call scheduled for August 22, 2018. In the meantime, please let us know if you have any additional questions or need clarification of our responses.

Sincerely,

  
David Rykaczewski  
Senior Technical Manager

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cc: Russ Cepko, CBS